

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

24-CV-40 (EAW) (MJR)

**FIRST AMENDED (01.23.2025) EXHIBIT LIST FOR FIDELIS
LEGAL SUPPORT SERVICES, LLC, CAMERON CHRISTO, AND
THE BUSH LAKE TRUST**

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*Attorneys for Defendant Fidelis
Legal Support Services, LLC, and for
Relief Defendants Cameron Christo and
The Bush Lake Trust*

Fidelis Legal Support Services, LLC, Cameron Christo, and The Bush Lake Trust submit the following first amended exhibit list in advance of the evidentiary hearing. We reserve the right to amend this list as necessary.

Exhibit	Description	Marked	Admitted
FX-1	Fidelis business information (Dkt. 179-3)	01.23.25	01.23.25
FX-2	Fidelis operating agreement (Dkt. 190-5)	01.23.25	01.23.25
FX-3	Bush Lake Trust agreement (Dkt. 190-7)	01.23.25	01.23.25
FX-4	Christo assignment of Fidelis to Bush Lake (Dkt. 190-6)	01.23.25	01.23.25
FX-5	Sample emails reflecting Christo's involvement in Fidelis operations from 2021 to 2024 (Dkt. 233-2)	01.23.25	01.23.25
FX-6	Sample emails reflecting Christo's involvement in Fidelis management and meetings. (Dkt. 233-7)	01.23.25	01.23.25
FX-7	Sample emails reflecting Christo's involvement in Fidelis operations and procedures. (Dkt. 233-8)	01.23.25	01.23.25
FX-8	Sample emails reflecting Christo's involvement in Fidelis hiring and human resources. (Dkt. 233-9)	01.23.25	01.23.25
FX-9	Sample emails reflecting Christo's involvement in billing. (Dkt. 233-10.)	01.23.25	01.23.25
FX-10	Sample Fidelis invoice to Hallock & Associates LLC (Dkt. 190-8)	01.23.25	01.23.25
FX-11	Sample email from Christo to Javier Avila attaching Fidelis invoices (July 12, 2023) (Dkt. 320-2)	01.23.25	01.23.25
FX-12	Email thread showing approval process for Fidelis invoices (Nov. 30, 2021 et seq.) (Dkt. 320-8)	01.23.25	01.23.25
FX-13	Email from Michelle Gallagher to Turnbull staff re Zainab Ikram receiving Fidelis email (May 3, 2021) (Dkt. 320-5)	01.23.25	01.23.25

Exhibit	Description	Marked	Admitted
FX-14	Email from Gallagher to Christo re changes to LeadTrac (May 18, 2021) (Dkt. 320-6)	01.23.25	01.23.25
FX-15	Emails between Lisette Alvarez and Gallagher re Christo input on Fidelis job titles (Jan. 19, 2022) (Dkt. 320-9)	01.23.25	01.23.25
FX-16	Email from Shirley Saavedra to Alvarez re hiring by Christo (Jan. 11, 2023) (Dkt. 320-10)	01.23.25	01.23.25
FX-17	Email thread involving Jay Gurst and Jason Blust re Christo contact information (Nov. 15, 2023 et seq.) (Dkt. 320-11)	01.23.25	01.23.25
FX-18	Email thread regarding "Owner Safeguard Policies" (Nov. 27, 2023 et seq.) (Dkt. 320-12)	01.23.25	01.23.25
FX-19	Emails from Alvarez regarding Fidelis employees' tax forms (Jan. 16, 2024 et seq.) (Dkt. 320-13)	01.23.25	01.23.25
FX-20	Email from Christo to employment counsel re Katherine Rosenberg (Mar. 8, 2024) (Dkt. 320-14)	01.23.25	01.23.25
FX-21	Declaration of Cameron Christo, dated March 4, 2024 (Dkt. 190-4)	01.23.25	01.23.25
FX-22	Declaration of Cameron Christo, dated March 21, 2024 (Dkt. 233-1)	01.23.25	01.23.25
FX-23	Declaration of Cameron Christo, dated April 22, 2024 (Dkt. 320-1)	01.23.25	01.23.25
FX-24	Declaration of Michelle Gallagher, dated March 21, 2024 (Dkt. 233-5)	01.23.25	01.23.25
FX-25	Declaration of Michelle Gallagher, dated April 22, 2024 (Dkt. 320-3)	01.23.25	01.23.25
FX-26	Declaration of Kristen Powers, dated March 21, 2024 (Dkt. 233-18)	01.23.25	01.23.25
FX-27	Declaration of Peggy Slivka, dated March 21, 2024 (Dkt. 233-19)	01.23.25	01.23.25

Exhibit	Description	Marked	Admitted
FX-28	Declaration of Hayfa Zayed, dated March 21, 2024 (Dkt. 233-20)	01.23.25	01.23.25
FX-29	Declaration of Christopher Turnbull, dated March 20, 2024 (Dkt. 233-21)	01.23.25	01.23.25
FX-30	Declaration of Lori Leigh, dated March 20, 2024 (Dkt. 233-22)	01.23.25	01.23.25
FX-31	Sample emails regarding Fidelis vs. Lit Def files (Dkt. 190-10)	01.23.25	01.23.25
FX-32	Sample emails regarding Fidelis vs. Lit Def files (Dkt. 233-3)	01.23.25	01.23.25
FX-33	Email thread with Gallagher and client-services entities re Fidelis vs. Lit Def files (Feb. 2, 2022 et seq.) (Dkt. 233-6)	01.23.25	01.23.25
FX-34	Emails between Blust and Gallagher re Lit Def wind down (Aug. 18, 2021 et seq.) (Dkt. 320-7)	01.23.25	01.23.25
FX-35	Email from Blust to Gallagher re reducing staff at law firms (Mar. 14, 2022) (Dkt. 270-5)	01.23.25	01.23.25
FX-36	Declaration of Alysa Zargaryan, dated April 19, 2024 (Dkt. 320-15)	01.23.25	01.23.25
FX-37	Declaration of Katherine Rosenberg, dated March 14, 2024 (Dkt. 212-1)	01.23.25	01.23.25
FX-38	Shirley Saavedra text chain (Dkt. 212-2)	01.23.25	01.23.25
FX-39	Christo email to Gallagher re missed payroll (Jan. 12, 2024) (Dkt. 233-4)	01.23.25	01.23.25
FX-40	Gallagher email to Rosenberg re job responsibilities (Feb. 7, 2024) (Dkt. 233-11)	01.23.25	01.23.25
FX-41	Rosenberg email to Gallagher re administrative leave (Feb. 8, 2024) (Dkt. 233-12)	01.23.25	01.23.25

Exhibit	Description	Marked	Admitted
FX-42	Gallagher email to Fidelis staff re Rosenberg administrative leave (Feb. 8, 2024) (Dkt. 233-13)	01.23.25	01.23.25
FX-43	Rosenberg email to Gallagher re quitting (Mar. 8, 2024) (Dkt. 233-14)	01.23.25	01.23.25
FX-44	Gallagher email to Rosenberg re quitting (Mar. 12, 2024) (Dkt. 233-15)	01.23.25	01.23.25
FX-45	Gallagher email to Fidelis staff re Rosenberg quitting (Mar. 12, 2024) (Dkt. 233-16)	01.23.25	01.23.25
FX-46	Rosenberg email to Gallagher re return of equipment (Mar. 18, 2024) (Dkt. 233-17)	01.23.25	01.23.25
FX-47	Receiver designation of Fidelis as a “Receivership Defendant” (Dkt. 190-9)	01.23.25	01.23.25
FX-48	Receiver report dated Jan. 22, 2024 (Dkt. 56)	01.23.25	01.23.25
FX-49	Receiver report dated Jan. 31, 2024 (Dkt. 115-1)	01.23.25	01.23.25
FX-50	Receiver report dated April 15, 2024 (Dkt. 292-1)	01.23.25	01.23.25
FX-51	Receiver report dated May 22, 2024 (Dkt. 359-1)	01.23.25	01.23.25
FX-52	Emails and records re Christo’s inquiries into Italian ancestry and work identifying family heritage/documents (Jan. 16, 2021 et seq.)	01.23.25	01.23.25
FX-53	Court documents re Christo’s state-court petition to obtain family heritage documents (May 20, 2024 et seq.)	01.23.25	01.23.25
FX-54	Receiver acknowledgement that the Turnbull Law Firms are contingency-fee firms.	01.23.25	01.23.25
FX-55	Lippes Mathias compliance audit dated November 4, 2016 (Dkt. 533-5).	01.23.25	01.23.25
FX-56	Emails, C. Christo sending invoices to J. Avila for processing/payment.	01.23.25	01.23.25

Exhibit	Description	Marked	Admitted
FX-57	Dkt. 209-1, Timothy Hanson Declaration, dated 03.14.2024.	01.23.25	01.23.25
FX-58	Dkt. 209-2, Theresa Ridder Declaration, dated 03.14.2024	01.23.25	01.23.25
FX-59	Dkt. 209-8, Ex. 6 to Ridder Declaration, bank records, Re wire from Turnbull to Fidelis, dated 12.21.2024	01.23.25	01.23.25
FX-60	Dkt. 477-2, Patrick Callahan Declaration, dated 11.01.2024	01.23.25	01.23.25
FX-61	Dkt. 477-34, Ex. 32 to Callahan 11.01.24 Declaration, Wells Fargo records, WF-00006002 through WF-00006005, dated on/about 11.19.2021 – Certification Regarding Beneficial Owner of Legal Entity Customers.	01.23.25	01.23.25
FX-62	Dkt. 477-38, Timothy Hanson 11.01.2024 Declaration.	01.23.25	01.23.25
FX-63	Dkt. 477-39, Ex. 1 to Hanson 11.01.24 Declaration, Wells Fargo records re Fidelis account transactions (26 pages) (also PX-107).	01.23.25	01.23.25
FX-64	Dkt. 477-42, Ex. 4 to Hanson 11.01.24 Declaration, voluminous Bank of America records re Turnbull account transactions, stamped 6150 et seq. (381 pages) (also PX-110).	01.23.25	01.23.25
FX-65	Dkt. 477-43, Declaration of Nicole Kelly, dated 11.01.2024.	01.23.25	01.23.25
FX-66	Dkt. 12, Ex Parte Temporary Restraining Order, entered Jan. 11, 2024.	01.23.25	01.23.25
FX-67	Dkt. 184, Preliminary Injunction, entered Mar. 4, 2024.	01.23.25	01.23.25
FX-68	PX-67 re Hewett, from February 2024 preliminary injunction hearing.	01.23.25	01.23.25
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Dated: Buffalo, New York
January 23, 2025

Respectfully submitted,

HOOVER & DURLAND LLP

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Services, LLC, and for Relief Defendants
Cameron Christo and The Bush Lake Trust*

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